

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA	)	INFORMATION
	)	
Plaintiff,	)	18 U.S.C. § 1343
	)	
v.	)	CR 16-82 WMW
	)	
ADAM JONATHAN MARTIN,	)	
	)	
Defendant.	)	

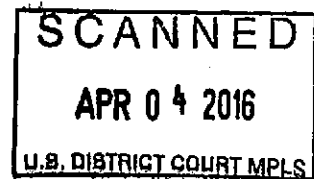
THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1  
(Wire Fraud)

From in or about August 2011 and continuing thereafter through in or about November 2014, in the State and District of Minnesota, the defendant,

**ADAM JONATHAN MARTIN,**

devised and intended to devise a scheme and artifice to defraud and to obtain money and property from Cold Spring Brewing Company by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing and attempting to execute such scheme and artifice, did knowingly cause to be transmitted in interstate commerce certain signs and signals by wire, that is, a wire transfer on December 8, 2011, of \$243,627 from a bank account belonging to Cold Spring Brewing Company to an account controlled by the defendant, in violation of Title 18, United States Code, Section 1343.



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**COUNT 2**  
(Wire Fraud)

From in or about October 2009 and continuing thereafter through in or about May 2015, in the State and District of Minnesota, the defendant,

**ADAM JONATHAN MARTIN,**

devised and intended to devise a scheme and artifice to defraud and to obtain money and property from individuals by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing and attempting to execute such scheme and artifice, did knowingly cause to be transmitted in interstate commerce certain signs and signals by wire, that is, a wire transfer on April 19, 2011, of \$50,000 from a bank account belonging to victim J.F. to the defendant's bank account, in violation of Title 18, United States Code, Section 1343.

**FORFEITURE ALLEGATIONS**

Upon conviction of Counts 1 and 2 of this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1343.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title

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21, United States Code, Section 853(p), as incorporated by Title 28, United States Code,  
Section 2461(c).

Dated: *April 4, 2016*

ANDREW M. LUGER  
United States Attorney

A handwritten signature in black ink, appearing to read "John Kokkinen", written over the printed name.

BY: JOHN KOKKINEN  
Assistant U.S. Attorney  
Attorney ID No. 388356